#### IN THE UNITED STATES DISTRICT COURT

### FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. \_\_\_\_\_

v. : DATE FILED: \_\_\_\_\_

QUINTON WALLACE, : VIOLATIONS:

a/k/a Quinton Williams, 21 U.S.C. § 841(a)(1) (possession with

a/k/a Quintin Jerome Williams, : intent to distribute marijuana - 1 count)
a/k/a Quinton Drayton, 21 U.S.C. § 860(a) (possession with intent

a/k/a Dagel Gillard. : to distribute marijuana within 1000 feet of

a school - 1 count)

: 18 U.S.C. § 924(c) (possession of a firearm

in furtherance of a drug trafficking

: crime - 1 count)

18 U.S.C. § 922(g)(1) (possession of a firearm by a convicted felon - 1 count)

**Notice of forfeiture** 

# **INDICTMENT**

## **COUNT ONE**

### THE GRAND JURY CHARGES THAT:

On or about January 11, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

QUINTON WALLACE, a/k/a Quinton Williams, a/k/a Quinton Jerome Williams, a/k/a Quentin Drayton, a/k/a Dagel Gillard,

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of marihuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

### **COUNT TWO**

### THE GRAND JURY FURTHER CHARGES THAT:

On or about January 11, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

QUINTON WALLACE, a/k/a Quinton Williams, a/k/a Quinton Jerome Williams, a/k/a Quentin Drayton, a/k/a Dagel Gillard,

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of marihuana, a Schedule I controlled substance, within 1000 feet of the real property comprising the Edward Heston School, a public elementary school, located at 1621 North 54<sup>th</sup> Street, Philadelphia, Pennsylvania in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 860(a).

### **COUNT THREE**

### THE GRAND JURY FURTHER CHARGES THAT:

On or about January 11, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

QUINTON WALLACE, a/k/a Quinton Williams, a/k/a Quinton Jerome Williams, a/k/a Quentin Drayton, a/k/a Dagel Gillard,

knowingly possessed a firearm, that is, a Smith & Wesson, Model 745, .45 caliber handgun, serial number TBB4778, loaded with eight (8) rounds of .45 caliber ammunition in the magazine and one (1) round of .45 caliber ammunition in the chamber, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute marihuana, in violation of Title 21, United States Code, Section 841(a)(1), and possession with intent to distribute marihuana within 1000 feet of an elementary school, in violation of Title 21, United States Code, Section 860(a).

In violation of Title 18, United States Code, Section 924(c)(1).

# **COUNT FOUR**

### THE GRAND JURY FURTHER CHARGES THAT:

On or about January 11, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

QUINTON WALLACE, a/k/a Quinton Williams, a/k/a Quinton Jerome Williams, a/k/a Quentin Drayton, a/k/a Dagel Gillard,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Smith & Wesson, Model 745, .45 caliber handgun, serial number TBB4778, loaded with eight rounds of .45 caliber ammunition in the magazine and one round of .45 caliber ammunition in the chamber.

In violation of Title 18, United States Code, Section 922(g)(1).

# **NOTICE OF FORFEITURE**

### THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 21, United States Code, Sections 841(a)(1) and 860(a) and Title 18, United States Code, Sections 924(c) and 922(g) set forth in this indictment, defendant

QUINTON WALLACE, a/k/a Quinton Williams, a/k/a Quinton Jerome Williams, a/k/a Quentin Drayton, a/k/a Dagel Gillard,

shall forfeit to the United States of America the firearm and ammunition involved in the commission of such offense, including, but not limited to:

One Smith & Wesson, Model 745, .45 caliber handgun, serial number TBB4778, loaded with eight rounds of .45 caliber ammunition in the magazine and one round of .45 caliber ammunition in the chamber.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:
GRAND JURY FOREPERSON

PATRICK L. MEEHAN

**UNITED STATES ATTORNEY**